

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department on its own motion into the appropriate regulatory plan to succeed price cap regulation for Verizon New England, Inc. d/b/a Verizon Massachusetts' retail intrastate telecommunications services in the Commonwealth of Massachusetts

DTE 01-31

**AT&T'S FIFTH SET OF INFORMATION
REQUESTS TO VERIZON**

AT&T Communications of New England, Inc. hereby submits to Verizon Massachusetts the following information requests. Please provide responses to these requests as they are completed.

Instructions

1. Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.
2. Please provide answers as they are completed.
3. These requests shall be deemed continuing so as to require supplemental responses if Verizon subsequently receives or becomes aware of additional information responsive to these requests.
4. If an answer refers to Verizon's response to another information request in this proceeding, please provide that response with the answer.
5. If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon cannot answer the request in full.
6. If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.

INFORMATION REQUESTS

1. Please state whether Verizon reports to the FCC for purposes of the FCC Report on Local Telephone Competition by the methodology included in the instructions for completing an FCC Form 447 (attached as Exhibit A to the Supplemental Surrebuttal of Deborah S. Waldbaum). If Verizon uses a different methodology, please state:
 - a. how Verizon's methodology for reporting to the FCC for purposes of the FCC Report on Local Telephone Competition differs from the methodology included in the instructions for completing an FCC Form 447 (attached as Exhibit A to the Supplemental Surrebuttal of Deborah S. Waldbaum);
 - b. of the two methodologies listed in (a) above, please state which methodology is likely to produce a higher count and explain your reasoning; and
 - c. by what order of magnitude and/or by what percentage the methodology provided in response to (b) above produces a higher count.

Please explain your answer and cite to and provide copies of all documentation that support your answer.

2. Please state whether Verizon reported its retail lines in the Massachusetts Competitive Profile by the methodology included in the instructions for completing an FCC Form 447 (attached as Exhibit A to the Supplemental Surrebuttal of Deborah S. Waldbaum). If Verizon used a different methodology, please state:
 - a. how Verizon's methodology for reporting its retail lines in the Massachusetts Competitive Profile differs from the methodology included in the instructions for completing an FCC Form 447 (attached as Exhibit A to the Supplemental Surrebuttal of Deborah S. Waldbaum);
 - b. of the two methodologies listed in (a) above, please state which methodology is likely to produce a higher count and explain your reasoning; and
 - c. by what order of magnitude and/or by what percentage the methodology provided in response to (b) above produces a higher count.

Please explain your answer and cite to and provide copies of all documentation that support your answer.

Respectfully submitted,

AT&T COMMUNICATIONS OF
NEW ENGLAND, INC.

By its attorneys,

Jeffrey F. Jones
Kenneth W. Salinger
Jay E. Gruber
Katherine A. Davenport
Palmer & Dodge LLP
111 Huntington Avenue
Boston, MA 02199
(617) 239-0100

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